

BUREAU OF LAND MANAGEMENT SUPPLEMENT TO THE INTERAGENCY PRESCRIBED FIRE PLANNING AND IMPLEMENTATION PROCEDURES GUIDE

Management Responsibilities Related to Prescribed Fire:

Existing delegations (910 DM 1.2) from the Secretary of the Department of the Interior (DOI) to the Director of the Bureau of Land Management (BLM) provide for the operation of the Fire Management Program, including prescribed fire.

1. The BLM Director is responsible for developing policy guidance for the use of prescribed fire.
2. The Assistant Director, Fire and Aviation, is delegated the responsibility for overall policy and guidance for prescribed fire management activities. These responsibilities include:
 - a. Establishing prescribed fire planning and fiscal guidance.
 - b. Establishing prescribed fire operational guidance.
 - c. Establishing prescribed fire personnel qualifications.
 - d. Establishing prescribed fire reporting procedures.
 - e. Establishing prescribed fire review criteria and procedures.
 - f. Establishing prescribed fire affects monitoring guidelines.
 - g. Providing assistance to BLM states, including smoke management, fire effects, equipment development, planning, and implementation.
 - h. Participating in national level smoke management and air quality programs.
 - i. Reviewing and/or investigating escaped prescribed fires.
3. The Assistant Director for Renewable Resources and Planning is responsible for establishing resource planning and National Environmental Policy Act (NEPA) compliance.
4. The state directors are responsible for developing, implementing, and evaluating prescribed fire operations. Each state director will:
 - a. Develop additional guidelines as needed for planning, implementing, monitoring, reporting, and evaluating of prescribed fire activities.

- b. Approve Prescribed Fire Plans. Authority may be delegated to the agency administrators (not specific offices) as provided under the BLM Manual Section 1203 – Delegation of Authority.
- c. Review and investigate escaped prescribed fires.
- d. Ensure that prescribed fires which receive a National Ambient Air Quality Standards (NAAQS) Notice of Violation (NOV) are reviewed according to established guidelines.
- e. Incorporate prescribed fire into geographic and local area preparedness plans.
- f. Ensure participation in state level smoke management programs.
- g. Perform periodic program reviews to ensure compliance with the BLM national and state standards.
- h. Ensure only trained and qualified personnel participate in the implementation portion of the prescribed fire program.

Prescribed Fire Planning and Implementation:

Additions to the Interagency Prescribed Fire Planning and Implementation Procedures Guide Policy are identified below. Reference the Interagency Prescribed Fire Planning and Implementation Guide (Rx Fire Guide) and utilize the following to determine the BLM additional policy requirements for planning and implementing prescribed fires. The BLM state offices may choose to provide more restrictive standards and policy direction, but must adhere to the minimums required in the Interagency Rx Fire Guide and the BLM additional requirements identified in this document.

Prescribed Fire Plan Technical Review/Technical Reviewer:

The BLM additional requirements to the Rx Fire Guide:

- Offices that develop their own Prescribed Fire Plans and complete their own technical reviews will ensure a minimum of one Prescribed Fire Plan per district per year is technically reviewed by a qualified individual from outside of the office.

Element 1 Signature Page:

The BLM additional requirements to the Rx Fire Guide:

- The BLM District or the BLM Field Office Fire Management Officer (FMO) will review and sign all the BLM developed Prescribed Fire Plans and multi-agency plans that will be implemented by the BLM. An FMO signature line will be inserted into the Prescribed Fire Plan Template; below the technical review signature.

Element 7 Prescription:

The BLM additional requirements to the Rx Fire Guide:

- At a minimum, a description for rate of spread and flame length will be developed utilizing a standard fire behavior prediction system or empirical evidence.

Element 9 Pre-Burn Considerations:

The BLM additional requirements to the Rx Fire Guide:

- Prior to implementing the prescribed fire, the responsible dispatch office will be given a complete copy (printed or electronically) of the Prescribed Fire Plan.
- Pre-burn briefings will include a discussion of the risks identified in the Risk Assessment Worksheet attached to the appendix as developed in element 13.

Element 13 Public and Personnel Safety, Medical:

The BLM additional requirements to the Rx Fire Guide:

- The BLM Risk Management Process will be used in place of the Job Hazard Analysis. The Risk Assessment worksheets will be attached as 'appendix D' to the prescribed fire plan.

Element 16 Holding Plan:

The BLM additional requirements to the Rx Fire Guide:

- The mop-up and patrol portion of the Holding Plan will provide a general description of the procedures to be implemented between the time of ignition and the time the prescribed fire is declared out. The prescribed fire burn boss will determine resource needs for mop up based on current and expected fire behavior and weather.

Element 17 Contingency Planning:

The BLM additional requirements to the Rx Fire Guide:

- Ranges of resources needed and response times may be identified. If no contingency resources are required, other than those identified and utilized in the Holding Plan, a statement documenting this fact will be included. In all contingency planning the duration that contingency resources are needed will be documented. Also, see Element 18, Wildfire Conversion.

Element 18 Wildfire Conversion:

The BLM additional requirements to the Rx Fire Guide:

- When a prescribed fire is declared a wildland fire, managers still have the full range of fire management options available based on Land Use Plan (LUP) and Fire Management Plan (FMP) objectives. If a prescribed fire is declared a wildland fire, a wildfire number will be assigned and all wildfire management costs will be charged to that number.
- In addition to the Rx Fire Guide directions, the following actions will be taken by designated staff on all the BLM prescribed fires that are declared wildland fires:
 - a. The BLM Agency Administrator responsible for the area will be notified by the Prescribed Fire Burn Boss (RxB) or FMO.
 - b. Management response to the declared wildfire is based on objectives established in the LUP and FMP. Contingency plans should be developed to identify critical values at risk, actions and resources needed, and other information necessary that may be utilized as an aid to determine and implement initial response actions when a wildfire is declared.
 - c. Notify any other Agency Administrators and/or landowners who may be affected (FMO, resource advisor, dispatch). Coordinate fire management actions with incident commanders, FMOs, and other affected parties.

Since all prescribed fires are planned management actions, a prescribed fire that is declared a wildfire that burns onto non-Federal lands may lead to tort claims and liability issues. The instructions contained in the BLM Manual, Section 1386 – Claims, should be followed. Special attention to documentation is critical.

Element 20 Monitoring:

The BLM additional requirements to the Rx Fire Guide:

- A Monitoring Plan is required for first order fire effects at a minimum. The plan will describe what data will be collected, when it will be collected, where on the prescribed fire site it will be collected, which methods will be used for each data element, and list the personnel responsible for collecting the data.
- The minimum requirements established for prescribed fire monitoring include weather during the fire, observed fire behavior; smoke dispersal and fire treatment objectives have been met.
- Prescribed fire funds can be used for monitoring treatment objectives. Treatment objectives and long term fire effects monitoring must be coordinated with the resource(s) benefiting from the prescribed fire treatment.

- Benefiting resources includes both natural resources and fire management programs.

Element 21 Post Burn Activities:

The BLM additional requirements to the Rx Fire Guide:

- **Prescribed Fire Report:** A post burn evaluation and summary that documents burn day weather, fuel conditions, fire behavior, problems, and concerns is required. The report must also indicate if objectives were met and make recommendations for future projects. The prescribed fire results must be compared to the fire treatment objectives and resource objectives that were identified for the project. The prescribed fire report must be completed and signed by the Prescribed Fire Burn Boss (RxB) and retained as part of the prescribed fire project file.
- **National Fire Plan Operations Reporting System (NFPORS):** All prescribed fire projects will be reported in NFPORS within five days after being declared out. When accomplishments are completed across fiscal years only those accomplishments completed in that fiscal year will be recorded.

Qualifications:

The BLM has additional requirements for some prescribed fire positions. The qualifications for each position are shown in the chart below. All the BLM personnel assigned to prescribed fire operations will meet the minimum qualifications outlined in this section. This will include the BLM personnel assigned to assist other agencies. The BLM additional requirements to the Rx Fire Guide:

Job Code Acronym	Course Index
BHAVE – Fire Behavior Modeling Program	ICS-300 Intermediate ICS for Supervisors & Expanding Incidents
FEMO - Fire Effects Monitor	L-280 Fellowship to Leadership
FFT1 - Firefighter, Type 1	M-580 Fire Program Management
FIRB - Firing Boss	M-581 Fire Program Management
FIRL - Firing Leader	
ICT3 - Incident Commander, Type 3	S-234 Ignition Operations
ICT4 - Incident Commander, Type 4	S-244 Field Observer
	S-260 Interagency Incident Business Management
RXB1 - Prescribed Fire Burn Boss, Type1	S-270 Basic Air Operations
RXB2 - Prescribed Fire Burn Boss, Type 2	S-290 Intermediate Wildland Fire Behavior
RXB3 - Prescribed Fire Burn Boss, Type 3	S-390 Introduction to Wildland Fire Behavior Calculations
RXM1 - Prescribed Fire Manager, Type 1	S-490 Advanced Fire Behavior Calculations
RXM2 - Prescribed Fire Manager, Type 2	
STL - Strike Team Leader	RX-301 Prescribed Fire Implementation
TFLD - Task Force Leader	RX-341 Prescribed Fire Plan Preparation
	RX-410 Smoke Management Techniques
	RX-510 Advanced Fire Effects

Position	Qualified as	Required Training	Suggested Training	Physical Fitness	Position Task Book
RXM1	RXB1	None		None	Required
RXM2	RXB2	None		None	Required
RXB1	RXB2 + ICT3	S-490 RX-410	RX-510 RX-410 M-581 M-580 RX-341	Light	Required
RXB2	FIRB + ICT4	S-390 RX-301* BHAV**	RX-410 M-581 I-300 RX-341	Moderate	Required
RXB3	ICT4	S-290	S-234 L-280 RX-341	Moderate	None
Prescribed Fire Holding Specialist	Appropriate ICS Qualification				
FIRL	FIRB + STL OR TFLD OR RXB2	S-390	RX-310 RX-301 RX-410 Aerial Ignition Devices	Moderate	Required
FIRB	Single Resource FFT1	S-290 S-230 S-234	L-280 S-260 S-270	Arduous	Required
FEMO	FFT2	S-290 RX-310	S-244	Arduous	Required
Prescribed Fire Plan Preparer	RXB1 RXB2***			None	None
Prescribed Fire Technical Reviewer	RXB1 RXB2***			None	None
Agency Administrator	N/A	Fire mgmt. Leadership		N/A	N/A

Bold print represents the BLM additional positions and requirements.

* RXB2 trainees must complete the new RX301 course if they have begun work on or finished an RXB2 task book but had not taken the RX300 course.

**BEHAVE is a self taught course, individuals must demonstrate efficiency in utilizing BEHAVE to prepare and review prescriptions.

*** Less currency or current depending on currency of other reviewer/preparer qualifications (see Interagency Prescribed Fire Planning and Implementation Procedures Guide 2008)

The table below identifies the position requirements for prescribed fire ignition operations when the position is assigned by the prescribed fire plan. The requirements are based on levels of complexity or type/number of resources assigned to the prescribed fire.

Position	Complexity		Type/number of resources assigned
FIRL Firing Leader	Prescribed Fire High Complexity	With	Simultaneous Multiple Air and Ground Ignition Firing Resources/Types
FIRB Firing Boss	Prescribed Fire Low and Moderate Complexity	With	Single Air and/or Single Ground Ignition Firing Resource/Type

Firing Boss (FIRB) to BLM FIRB:

Current FIRB qualified employees must complete the BLM additional training (S-234) and achieve the arduous physical fitness rating to qualify as the BLM FIRB. Current FIRB trainees must complete the BLM additional training and achieve the arduous physical fitness rating to qualify as the BLM FIRB.

BLM FIRB to Firing Leader (FIRL):

If all the current FIRB Position Task Book (PTB) elements, prerequisite qualifications (Strike Team Leader (STL) or Task Force Leader (TFLD) or Prescribed Fire Burn Boss, Type 2 (RxB2), and training (Ignition Operations (S234) and Introduction to Wildland Fire Behavior Calculations (S390)) of current FIRBs have been completed in the past then a FIRL PTB will be completed to qualify as a FIRL. However, if the employee and local Red Card Committee are satisfied with the employee's experience, skills, and competencies involving high complexity ignition operations then the FIRL position can be awarded without FIRL PTB being completed.

The BLM will accept other agency personnel FIRB qualifications for firing or ignition operations on the BLM prescribed fires.

Contractor and Cooperator Plan Development and Implementation:

The BLM additional requirements to the Rx Fire Guide:

- The BLM will provide the technical review for contractor or cooperator written plans developed for the BLM.
- If a contractor is actively involved in igniting, holding or mopping up a BLM prescribed fire, a Contracting Officers Representative (COR) or Project Inspector (PI) will be on site (exceptions can be made for mop up and patrol) to ensure that the burn objectives are being met and the terms of the contract are followed.

- The BLM representative (COR or PI) must have at a minimum wildland fire qualifications at the BLM FIRB level.

Reviews:

The BLM additional requirements to the Rx Fire Guide:

- Levels and responsibilities for administrative reviews when prescribed fires are declared a wildfire:
- The Fire Management Officer. The BLM district or BLM Field Office FMO is required to investigate all prescribed fires declared a wildfire, either personally or through an appropriate designated investigator.
- The Agency Administrator. The Agency Administrator is responsible for ensuring adequate and proper investigation of all prescribed fires that are declared a wildfire.
- The Agency Administrator may appoint an investigation team or request that one be appointed consistent with Manual Section 1112 - Safety, paragraph .22D, Accident Investigations.
- The Agency Administrator will notify the State Fire Management Officer (SFMO) and the State Director of the wildfire declaration.
- The BLM State Director. The BLM State Directors are responsible for ensuring adequate, proper investigation of all prescribed fires declared a wildfire which result in serious or multiple personal injuries, significant burned area on private or other agency lands, or an estimated expenditure of up to \$250,000 for suppression and/or property damage.

The BLM State Director will notify the BLM Assistant Director, Fire and Aviation, if the above criterion was met within 24 hours. Copies of the completed review report will be sent to the BLM Assistant Director, Fire and Aviation.

The BLM Assistant Director, Fire and Aviation is responsible for ensuring adequate and proper investigation of all prescribed fires declared a wildfire which result in fatality, injuries to people not involved in the prescribed fire operation, fire shelter deployment, a major transportation route closure, smoke significantly impacting a major population center or causing a public health concern, or where suppression expenditures and/or property damage exceed \$250,000. The scope of the review will be determined by factors such as extent or type of injuries sustained, property damage, and smoke issues associated with the declared wildfire. The Rx Fire Guide describes seven elements that will be addressed at a minimum (see Rx Fire Guide; Reviews chapter, page 29).

Escape Prescribed Fire Reports:

If a prescribed fire is declared a wildland fire, two fire reports are required. The acreage burned while a prescribed fire would be reported in NFPORS as prescribed fire acreage using the prescribed fire number. Acreage burned after the fire was declared a wildland fire would be reported as wildfire acreage in the BLM Fire Reporting System (1202) using the local fire number.